

AFFIDAVIT OF KEVIN P. MURPHY

North Carolina

County of Mecklenburg

Kevin P. Murphy, appearing before the undersigned notary and being duly sworn, says that:

1. I am over the age of 18 and suffer from no legal disabilities. The information contained in this affidavit is based upon personal knowledge.
2. I am an attorney who limits his practice to employment law in Charlotte, North Carolina.
3. I graduated with honors from the University of North Carolina with a B.A. in 2007. I graduated *magna cum laude* from the University of Georgia School of Law in 2010. I clerked for the United States District Court for the Southern District of Georgia and the United States District Court for the Western District of North Carolina from 2010 through 2012. I then practiced with the Labor and Employment Law Firm of Littler Mendelson for three and a half years, representing management in all manner of employment matters before moving to the plaintiff's side of employment matters with Van Kampen Law, PC, where I have practiced since February 2016. I have served in several leadership capacities including but not limited to North Carolina Advocates for Justice Employment Law Section Vice-Chair, North Carolina Advocates for Justice Employment Law Section Secretary, North Carolina Bar Association, 4All Service Day Committee Member, Mecklenburg Bar Association Pro Bono & Legal Recruitment Committee Member. I am also a frequent lecturer in employment law CLEs including most recently at the 33rd Annual NC/SC Labor and Employment Law Conference as a speaker on "Ethical Issues in Employment Practice" and the Mecklenburg County Bar's

CLE entitled, “What is the Public’s Policy? Wrongful Discharge after HB2,” as both the organizer and a speaker. I also recently presented at the Western District of North Carolina’s Pro Se Settlement Assistance Program Overview and Recruitment Event. SuperLawyers rated me a Rising Star in Employment Litigation in 2018. I volunteer with Legal Aid of North Carolina’s Lawyer on the Line program and the Western District’s Pro Se Settlement Assistance Program.

4. The *Driskell v. Summit Contracting* matter before this Court was my second federal jury trial and second trial in which my client obtained a verdict in its favor on all counts. I have also secured successful trial results for my clients in state court and arbitration. I have also represented a client at trial before an Administrative Law Judge of the Department of Labor. I am admitted to practice in all courts in North Carolina and have been admitted to the United States District Courts for the Western, Eastern, and Middle Districts of North Carolina, in addition to the Fourth Circuit Court of Appeals.
5. Sean Herrmann graduated *summa cum laude* from Illinois College in 2009 with a Bachelor of Arts. While there, he interned at the United States Attorneys’ Office, Civil Division, in Washington, DC and worked exclusively on employment law matters affecting federal government agencies. Sean then attended the University of Illinois College of Law and graduate *magna cum laude* in 2012. During law school, Sean worked for Freking & Betz, a highly respected plaintiff-side employment law firm in Cincinnati, Ohio. In 2012, Sean began working for Van Kampen Law, PC. At Van Kampen Law, Sean exclusively practices plaintiff-side employment law. Sean has successfully represented employees in race, sex, pregnancy, national origin, disability, veteran, and age discrimination matters. Sean also represents employees fac-

ing unlawful pay practices and sexual harassment at the workplace. In October 2017, Sean successfully represented our client in a race discrimination arbitration, winning a \$324,650 award for our client. Sean is licensed to practice in both North and South Carolina and has been admitted to the United States District Courts for the Western, Eastern, and Middle Districts of North Carolina and for the District of South Carolina. Sean has also also been admitted to the Fourth Circuit Court of Appeals, and has conducted oral argument there. Sean has also served in several leadership positions. For example, Sean was chosen for and currently serves on the North Carolina Bar Association's Labor and Employment Law Council and he is Co-Chair of the North Carolina Labor & Employment Law's Newsletter Section. Sean also serves on the Mecklenburg County Bar's Professionalism, Lawyer Life and Culture Committee. Sean volunteers with Legal Aid of North Carolina's Lawyer on the Line program and the Western District's Pro Se Settlement Assistance Program. Sean presented the Federal employment law update at the North Carolina Advocate for Justice's Convention in 2017. Furthermore, in 2017 Sean was recognized by Best Lawyers in America.

6. Josh Van Kampen is the founder and leader of Van Kampen Law, PC. In 2018, SuperLawyers rated Josh in its "Top 100" attorney list for all of North Carolina and in its Top 25 attorney list for Charlotte. Josh started his practice in Chicago, Illinois, where he worked as an associate for two nationally recognized employment law defense firms: Seyfarth Shaw and Franczek Radelet. During his six years as a defense attorney, Josh defended Fortune 500 companies as well as smaller businesses in age, race, sex, disability, sexual harassment, traditional labor, and wage and hour litigation. In 2004, Josh left his career as a management-side employment law attorney to open a practice in Charlotte devoted exclusively to representing

victims of discrimination, sexual harassment, unequal pay, wrongful discharge, retaliation, and wage and hour violations. Prior to forming Van Kampen Law, PC in July 2011, Josh was a partner at two of the premier, plaintiff-side employment law firms in North Carolina: Fossbinder & Van Kampen, PLLC and Patterson Harkavy, LLP. Josh has practiced employment law continuously since graduating from the University of Illinois College of Law in 1998. Josh is admitted to practice in all courts in North Carolina and has been admitted to the United States District Courts for the Western, Eastern, and Middle Districts of North Carolina, in addition to the Fourth Circuit Court of Appeals. Josh has served in several leadership capacities including but not limited to North Carolina Advocates for Justice Employment Law Section Chair, Executive Committee Member of the North Carolina Bar Association's Employment Law section and is currently the Vice-Chair of the Mecklenburg County Bar Association's Employment Law section. Josh is also a frequent lecturer in employment law CLEs including most recently: "Introduction to Federal Employment Law, NCBA" in Cary, NC, February 16, 2018, and "Changes to Federal Rules of Civil Procedure," NCBA/SCBA & Employment Law Program, Asheville, N.C., October 2016.

7. Sean Herrmann and I bill our hourly clients at \$300 per hour. Josh Van Kampen bills his clients at \$450 per hour.
8. Based on my experience at Littler Mendelson and my knowledge of the rates charged by other employment law attorneys in Charlotte, North Carolina, these rates are reasonable for counsel with our experience in this area.
9. In this matter, Josh Van Kampen reasonably and necessarily expended 560.8 hours of time on behalf of our client. Sean Herrmann and I reasonably and necessarily expended a combined

total of 630.8 hours of time on behalf of Plaintiff. Our paralegals reasonably and necessarily expended a combined total of 153.80 hours of time on behalf of Plaintiff. Our law clerks reasonably and necessarily expended a combined total of 113.45 hours of time on behalf of Plaintiff.

10. Attached is a true and accurate accounting of how this time was spent by each attorney and staff member working on this matter.
11. The statements made in this affidavit are true and correct.
12. I make this statement based solely upon my own personal knowledge.
13. I make this statement by my own free will and volition without promise of any benefit for doing so and without threat of any penalty or consequence for not doing so.
14. Further affiant sayeth not. I declare, under penalty of perjury, that the foregoing is true and correct.


Affiant, Kevin P. Murphy 2/20/18

STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

Sworn to or affirmed and subscribed before me this the 20TH day of FEBRUARY, 2018.




Official Signature of Notary

CHAMPAK CHITA BHULA
Notary Public

My commission expires: _____
**My Commission expires
March 1, 2021**

Justin Driskell v. Summit Contracting Group, Inc.
Tally of Service Fees and Costs

<u>Biller</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Lead Counsel Time	560.80	\$450.00	\$252,360.00
Associate Time	630.80	\$300.00	\$189,240.00
Senior Support Staff Time	153.80	\$150.00	\$23,070.00
Assisting Support Staff Time	113.45	\$100.00	\$11,345.00
Expenses			
GRAND TOTAL			\$476,015.00

Justin Driskell v. Summit Contracting Group, Inc.
Lead Counsel Time

Date	Staff	Rate	Description of Costs and Services	Time	Charge
09/30/2015	JVK	\$450	Prepare LOR.	0.90	\$405.00
10/01/2015	JVK	\$450	Prepare LOR.	0.70	\$315.00
10/01/2015	JVK	\$450	Prepare LOR.	0.60	\$270.00
10/17/2015	JVK	\$450	Review file and letter from OC. Communicate with Client.	0.30	\$135.00
10/17/2015	JVK	\$450	Review file. Delegate tasks.	0.20	\$90.00
10/20/2015	JVK	\$450	Review file.	0.10	\$45.00
10/27/2015	JVK	\$450	Review file. Delegate.	0.20	\$90.00
11/25/2015	JVK	\$450	Prepare for call with OC.	1.10	\$495.00
12/03/2015	JVK	\$450	Review file.	0.30	\$135.00
12/10/2015	JVK	\$450	Communicate with client. Review file.	0.20	\$90.00
12/11/2015	JVK	\$450	Prepare for call with OC. Call with OC.	1.70	\$765.00
12/18/2015	JVK	\$450	Review file. Communicate with OC.	0.20	\$90.00
12/22/2015	JVK	\$450	Comms with OC	0.10	\$45.00
12/28/2015	JVK	\$450	Review file.	0.30	\$135.00
01/13/2016	JVK	\$450	Finalize questionnaire. Communicate with Client.	1.80	\$810.00
01/13/2016	JVK	\$450	Review and revise NCDOL questionnaire. Communicate with Client.	1.20	\$540.00
01/14/2016	JVK	\$450	Communicate with OC.	0.20	\$90.00
02/18/2016	JVK	\$450	Internal communications re status.	0.10	\$45.00
02/22/2016	JVK	\$450	Review letter from NCDOL. Analyze and delegate.	0.40	\$180.00
02/24/2016	JVK	\$450	Review file. communications with staff.	0.10	\$45.00
02/26/2016	JVK	\$450	Review file, call from NCDOL	0.20	\$90.00
03/01/2016	JVK	\$450	Review file. prep for call with NCDOL	0.20	\$90.00
03/01/2016	JVK	\$450	Prepare for cal with NCDOL, call with NCDOL.	0.50	\$225.00
03/15/2016	JVK	\$450	Research re NCDOL jurisdiction regarding RTS.	0.70	\$315.00
03/18/2016	JVK	\$450	Prepare for call with NCDOL GC. Call with NCDOL GC.	0.80	\$360.00
03/29/2016	JVK	\$450	Review file. Delegate.	0.20	\$90.00
03/31/2016	JVK	\$450	Review file. Delegate.	0.10	\$45.00
04/08/2016	JVK	\$450	Review file. Delegate	0.10	\$45.00
06/27/2016	JVK	\$450	Finalize offer, prepare email to OC.	0.30	\$135.00
07/05/2016	JVK	\$450	Review file, communications with OC.	0.20	\$90.00
07/11/2016	JVK	\$450	Review file, communications with OC.	0.20	\$90.00
08/03/2016	JVK	\$450	Review file, analyze litigation contract.	0.20	\$90.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
09/24/2016	JVK	\$450	Prepare complaint.	1.50	\$675.00
10/18/2016	JVK	\$450	Revise complaint.	1.60	\$720.00
10/20/2016	JVK	\$450	Finalize complaint.	1.90	\$855.00
10/24/2016	JVK	\$450	Final review of complaint.	0.40	\$180.00
10/24/2016	JVK	\$450	Communicate with staff and OC re service.	0.20	\$90.00
10/28/2016	JVK	\$450	Research re OSHA regs and violence in workplace	0.30	\$135.00
10/31/2016	JVK	\$450	Review file.	0.10	\$45.00
11/30/2016	JVK	\$450	Review initial scheduling order.	0.30	\$135.00
12/03/2016	JVK	\$450	Review file, review removal documents, delegate.	0.50	\$225.00
12/15/2016	JVK	\$450	Review motion.	0.40	\$180.00
12/20/2016	JVK	\$450	Review Motion to Dismiss.	1.80	\$810.00
12/21/2016	JVK	\$450	Prepare brief.	1.80	\$810.00
12/22/2016	JVK	\$450	Review brief in opposition to Motion to Dismiss.	3.90	\$1,755.00
01/10/2017	JVK	\$450	Review court order on Motion to Dismiss, discuss with associates.	0.30	\$135.00
01/23/2017	JVK	\$450	Review answer.	0.50	\$225.00
02/01/2017	JVK	\$450	Comms with OC	0.10	\$45.00
02/13/2017	JVK	\$450	comms with NCDOL, begin review of NCDOL file	0.50	\$225.00
02/17/2017	JVK	\$450	Prepare initial disclosures.	0.50	\$225.00
02/17/2017	JVK	\$450	Prepare initial disclosures.	0.20	\$90.00
02/17/2017	JVK	\$450	Prepare initial disclosures.	0.20	\$90.00
03/29/2017	JVK	\$450	Prepare discovery requests.	6.20	\$2,790.00
03/30/2017	JVK	\$450	Prepare discovery requests.	4.30	\$1,935.00
04/06/2017	JVK	\$450	comm with OC, begin review of D discovery requests	0.50	\$225.00
04/07/2017	JVK	\$450	Review discovery requests.	0.50	\$225.00
04/18/2017	JVK	\$450	Review file, communications with Client	0.40	\$180.00
05/02/2017	JVK	\$450	Comms with OC	0.20	\$90.00
05/21/2017	JVK	\$450	Prepare discovery responses.	2.00	\$900.00
05/22/2017	JVK	\$450	Prepare discovery responses.	0.80	\$360.00
05/25/2017	JVK	\$450	Comms with OC, delegate	0.20	\$90.00
05/26/2017	JVK	\$450	Analyze discovery and prepare 30(b)(6) notice.	1.80	\$810.00
05/29/2017	JVK	\$450	Analyze discovery and prepare 30(b)(6) notice.	2.50	\$1,125.00
05/30/2017	JVK	\$450	Analyze discovery strategy and prepare 30(b)(6) notice.	1.30	\$585.00
06/05/2017	JVK	\$450	Review discovery responses.	4.50	\$2,025.00
06/05/2017	JVK	\$450	Finalize 30(b)(6).	1.10	\$495.00
06/06/2017	JVK	\$450	Review file; conf with SFH and KM regarding trial date, witnesses, other trial matters.	0.80	\$360.00
06/07/2017	JVK	\$450	Comms with OC, review discovery	0.30	\$135.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
06/09/2017	JVK	\$450	comm with OC re 30b6	0.30	\$135.00
06/09/2017	JVK	\$450	prepare for comms with OC re same	0.30	\$135.00
06/09/2017	JVK	\$450	research regarding deposition locations under FRCP.	1.90	\$855.00
06/12/2017	JVK	\$450	Review document production.	1.00	\$450.00
06/12/2017	JVK	\$450	prepare Meet and Confer	1.00	\$450.00
06/12/2017	JVK	\$450	research for Meet and Confer	0.80	\$360.00
06/12/2017	JVK	\$450	Review discovery	2.60	\$1,170.00
06/12/2017	JVK	\$450	Prepare Meet and Confer.	0.60	\$270.00
06/13/2017	JVK	\$450	Prepare Meet and Confer re 30b6.	0.90	\$405.00
06/13/2017	JVK	\$450	Review discovery responses, prepare meet and confer, research for meet and confer letter.	5.10	\$2,295.00
06/14/2017	JVK	\$450	Prepare for call with OC, call with OC, research re discovery of internal investigation file	1.50	\$675.00
06/15/2017	JVK	\$450	Review file, communications with OC.	0.20	\$90.00
06/19/2017	JVK	\$450	Review file, begin preparing for depositions, communications with client, communications with OC, research re mediators.	3.10	\$1,395.00
06/20/2017	JVK	\$450	Review discovery responses, communications with OC.	0.80	\$360.00
06/22/2017	JVK	\$450	Prepare for call with OC, call with OC, begin review of supplemental production.	2.60	\$1,170.00
06/22/2017	JVK	\$450	Review Meet and Confer letter, delegate, review supplemental production.	0.90	\$405.00
06/23/2017	JVK	\$450	Review supplemental production, delegate re meet and confer, comms with OC	1.00	\$450.00
06/26/2017	JVK	\$450	Review and revise defendant's motion for extension.	0.40	\$180.00
06/28/2017	JVK	\$450	review and revise meet and confer letter and P's supplemental production	0.50	\$225.00
07/03/2018	JVK	\$450	Review order on scheduling order; comms with Rhyner former ER we subpoenaed.	0.30	\$135.00
07/04/2017	JVK	\$450	Prepare for depositions, comms with staff re Rhyner subpoenas	1.60	\$720.00
07/06/2017	JVK	\$450	Comms with Judge Keesler clerk re discovery dispute, review D's subpoenas to P former/current employer, begin review of D's response to meet and confer letter; Delegate, comms with third party subpoena in house counsel	2.20	\$990.00
07/10/2017	JVK	\$450	Analyze damages, prepare new settlement offer. Comm with client and OC re same, research re recent WD verdicts	2.00	\$900.00
07/11/2017	JVK	\$450	Prepare for Meet and Confer meeting with OC; Meet and Confer meeting with OC; debrief; communications with Client.	4.50	\$2,025.00
07/21/2017	JVK	\$450	Comms with OC re deps and outstanding discovery disputes, prepare for Padgett and Rhyner deps	1.50	\$675.00
07/24/2017	JVK	\$450	Comms with OC re deps, Review doc production, Prepare for Jacksonville deps	4.50	\$2,025.00
07/25/2017	JVK	\$450	Comms with OC re deps, Review doc production. Prepare for upcoming deps	8.00	\$3,600.00
07/26/2017	JVK	\$450	Prepare for Padgett and Rhyner depositions. Travel. Comms with C.	10.80	\$4,860.00
07/27/2017	JVK	\$450	Prepare for depositions, conduct Padgett and Rhyner deposition, conduct depositions, prepare for next day	12.20	\$5,490.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
07/28/2017	JVK	\$450	Prepare for 30b6 depositions, conduct 30b6 depositions, prepare for next day deposition.	10.50	\$4,725.00
07/29/2017	JVK	\$450	Prepare for Fudge deposition, conduct Fudge deposition, review late produced documents. Comms with OC re investigation docs.	8.90	\$4,005.00
07/30/2017	JVK	\$450	Review notes, assess depositions, travel back to CLT	3.00	\$1,350.00
07/31/2017	JVK	\$450	Comms with OC re keyword search. Delegate re same. Comms with firm representing third party contractor subpoena	0.80	\$360.00
08/01/2017	JVK	\$450	review subpoenas response from third party subpoena to contractor, review termini subpoena.	0.70	\$315.00
08/08/2017	JVK	\$450	Comms with OC	0.10	\$45.00
08/10/2017	JVK	\$450	Comms with OC re D's second set of discovery requests	0.10	\$45.00
08/11/2017	JVK	\$450	review third party subpoenas response from Rhyner former employer, delegate	0.20	\$90.00
08/18/2017	JVK	\$450	Comms with third party contractor counsel	0.10	\$45.00
08/20/2017	JVK	\$450	Review subpoena responses. Delegate.	0.30	\$135.00
08/21/2017	JVK	\$450	Communicate with staff re subpoenas, review subpoena responses.	0.30	\$135.00
08/22/2017	JVK	\$450	review subpoenas response from Graham	0.10	\$45.00
08/24/2017	JVK	\$450	Comm with staff re P's responses to d's second send	0.10	\$45.00
08/25/2017	JVK	\$450	Review authorizations, communications with staff re same.	0.20	\$90.00
08/28/2017	JVK	\$450	Review discovery responses, follow up with OC re deficiencies.	0.80	\$360.00
08/29/2017	JVK	\$450	Review email from OC re ESI, analyze, send response email with compromises.	1.00	\$450.00
08/30/2017	JVK	\$450	Communicate with OC. Review comms from OC re medical releases.	0.20	\$90.00
09/01/2017	JVK	\$450	Review file, communications with OC.	0.20	\$90.00
09/02/2017	JVK	\$450	Preparation to defend plaintiff deposition.	2.10	\$945.00
09/03/2017	JVK	\$450	Prep for plaintiff deposition.	2.30	\$1,035.00
09/04/2017	JVK	\$450	Prepare to defend plaintiff deposition, delegate tasks to staff.	2.60	\$1,170.00
09/05/2017	JVK	\$450	Comms with OC docs produced at depositions	0.10	\$45.00
09/07/2017	JVK	\$450	Final preparation to defend deposition, defend deposition, debrief with client.	10.00	\$4,500.00
09/15/2017	JVK	\$450	Prepare Tom Driskell for deposition, prepare to defend deposition. Comms with OC re phone records	2.80	\$1,260.00
09/16/2017	JVK	\$450	Prep for Tom Driskell deposition.	0.40	\$180.00
09/23/2017	JVK	\$450	Prepare for mediation, opening statement.	4.50	\$2,025.00
09/25/2017	JVK	\$450	Final prep for mediation, attend mediation, debrief with client.	6.00	\$2,700.00
09/26/2017	JVK	\$450	Review most recent document production, communications with OC re same.	4.10	\$1,845.00
09/27/2017	JVK	\$450	Comms with OC, review D's notice of depositions, delegate	0.30	\$135.00
09/28/2017	JVK	\$450	Prepare discovery requests. Comms with OC re judicial settlement conference.	0.40	\$180.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
10/02/2017	JVK	\$450	Review new discovery from defendant, conf. with KPM re same, comms with OC re extensions	0.40	\$180.00
10/04/2017	JVK	\$450	Comm with G. Rodgers, comms with OC re Rodgers dep	0.30	\$135.00
10/05/2017	JVK	\$450	comms with staff re Rodgers depositions. Review discovery related to Rodgers, comms with C re same. Comms with OC re MSJ	0.50	\$225.00
10/06/2017	JVK	\$450	Prep for Rodgers depositions. Defend Rodgers depositions. Debrief	6.00	\$2,700.00
10/12/2017	JVK	\$450	Comms with OC re discovery responses to P's second set, begin review	0.30	\$135.00
10/13/2017	JVK	\$450	Comms with OC re supplemental production, begin review. Comms with OC re our subpoena response. Prepare for next week's depositions	5.50	\$2,475.00
10/14/2017	JVK	\$450	Prepare for week of deposition; prepare outlines.	2.50	\$1,125.00
10/15/2017	JVK	\$450	Comms with OC re discovery responses to P's second set, begin review.	3.00	\$1,350.00
10/16/2017	JVK	\$450	Prepare for week of depositions. Travel to Jacksonville.	11.00	\$4,950.00
10/17/2017	JVK	\$450	Prepare for first day of depositions Blunn and Graham. Conduct depositions. Prepare for next day depositions.	10.40	\$4,680.00
10/18/2017	JVK	\$450	Prep for Padgett/Born depositions. Conduct Padgett/Born depositions.	13.00	\$5,850.00
10/19/2017	JVK	\$450	Prep for final deposition. Conduct final deposition. Begin summarizing accomplishments from week of depositions. Travel time back to CLT.	7.00	\$3,150.00
10/20/2017	JVK	\$450	Prepare consolidated memo/index of pertinent stuff from last round of depositions for brief and oral argument on MSJ	3.50	\$1,575.00
10/21/2017	JVK	\$450	Review last round of deposition transcripts, prepare consolidated memo summarizing pertinent points for brief and oral argument on MSJ	5.80	\$2,610.00
10/22/2017	JVK	\$450	Review deposition transcripts from last round, prepare document consolidating pertinent points for use in brief and oral argument on MSJ	2.50	\$1,125.00
10/22/2017	JVK	\$450	Prepare for week of depositions.	2.00	\$900.00
10/23/2017	JVK	\$450	Prepare MSJ Opposition Brief.	8.20	\$3,690.00
10/24/2017	JVK	\$450	Analyze damages, prepare pre and post SJ offer.	1.30	\$585.00
10/27/2017	JVK	\$450	Comms with OC re D's responses to P's third set, begin reviewing	0.20	\$90.00
10/30/2017	JVK	\$450	Assess case value, prepare pre and post SJ settlement offers, email to OC re same. Comms with OC re extensions	2.20	\$990.00
10/21/2017	JVK	\$450	Comms with OC re Verizon subpoena response	0.10	\$45.00
11/08/2017	JVK	\$450	Prepare discovery responses.	2.60	\$1,170.00
12/05/2017	JVK	\$450	Review Order denying MSJ, internal comms and comms with Client re same. Comms with OC re trial date. Begin trial prep	2.00	\$900.00
12/11/2017	JVK	\$450	Begin prep for trial. Comms with OC re supplemental production, review supplemental	1.00	\$450.00
12/12/2017	JVK	\$450	Trial Preparation: begin on big picture themes	3.70	\$1,665.00
12/18/2017	JVK	\$450	Trial Preparation: review transcripts for witness exams, analysis.	5.30	\$2,385.00
12/19/2017	JVK	\$450	Review and revise pre-trial submissions. Trial prep - review transcripts for witness exams.	6.00	\$2,700.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
12/20/2017	JVK	\$450	Trial preparation: review depositions, prepare for witness exams. PC with OCs.	3.80	\$1,710.00
12/21/2017	JVK	\$450	Review and revise trial brief and other pre-trial submissions.	2.80	\$1,260.00
12/27/2017	JVK	\$450	Trial preparation: review Rhyner and Fudge deposition transcripts, incorporate into trial exams	5.70	\$2,565.00
12/28/2017	JVK	\$450	Trial preparation: review Marc Padgett transcript for direct exam.	6.90	\$3,105.00
12/31/2017	JVK	\$450	Trial preparation: finish Padgett deposition review, begin drafting outline; begin Nicole Padgett deposition review.	4.40	\$1,980.00
12/31/2017	JVK	\$450	Trial preparation: review Nicole Padgett transcript incorporate into direct exam; review and revise opposition brief to motion to quash.	4.80	\$2,160.00
01/02/2018	JVK	\$450	Trial preparation: assist with voir dire prep, prepare for pre-trial conference, attend pre-trial conference, review Nicole Padgett's transcript and incorporate into outline.	8.20	\$3,690.00
01/03/2018	JVK	\$450	Trial preparation: final preparation for voir dire examination, assist with voir dire, debrief, strategize re witness order etc. in light of jury selection.	7.90	\$3,555.00
01/04/2018	JVK	\$450	Trial preparation: work on mock jury process, scheduling, create add and questionnaire.	2.70	\$1,215.00
01/05/2018	JVK	\$450	Trial preparation: work on mock jury process, prepare for mock trial roles	2.00	\$900.00
01/08/2018	JVK	\$450	Driskell: trial prep, review Fudge transcript, prepare direct exam, review exhibits.	7.10	\$3,195.00
01/09/2018	JVK	\$450	Driskell: trial prep, review Fudge transcript, prepare direct exam, review exhibits.	4.50	\$2,025.00
01/10/2018	JVK	\$450	Driskell: trial prep, review Fudge transcript, prepare direct exam, review exhibits, mock trial prep	5.00	\$2,250.00
01/11/2018	JVK	\$450	Trial preparation: review Nicole Padgett transcript, prepare outline, mock trial preparation.	6.60	\$2,970.00
01/12/2018	JVK	\$450	Trial preparation: devise mock juror materials, prepare Rhyner outline, prepare closing.	8.80	\$3,960.00
01/13/2018	JVK	\$450	Trial preparation: finalize mock closing, rehearse with actor witnesses, conduct focus group, debrief.	8.10	\$3,645.00
01/14/2018	JVK	\$450	Trial preparations: begin work on opening, research re openings.	4.70	\$2,115.00
01/15/2018	JVK	\$450	Trial preparation: watch focus group deliberations, analyze, prepare memo regarding adjustments for plaintiff's testimony and course changes for trial, communications with SFH and KPM re same.	6.50	\$2,925.00
01/16/2018	JVK	\$450	Trial preparation: Prepare opening. Research re openings and using deposition testimony. Communications re exhibit / submission issues with OC.	9.90	\$4,455.00
01/17/2018	JVK	\$450	Trial preparation: prepare opening, review depositions for opening, research re openings; research re OSHA standards on drinking/violence including call with OSHA attorney in town, review plaintiff.	8.10	\$3,645.00
01/18/2018	JVK	\$450	Trial preparation: prepare opening, review Plaintiff's video deposition for opening; Research re Public Policy and OSHA.	6.90	\$3,105.00
01/19/2018	JVK	\$450	Trial preparation: prepare Fudge outline, review exhibits	4.00	\$1,800.00
01/20/2018	JVK	\$450	Trial preparation: prepare Fudge outline, review transcript, documents etc.	1.10	\$495.00
01/21/2018	JVK	\$450	Trial preparation: including preparing demonstrative exhibits.	0.30	\$135.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
01/22/2018	JVK	\$450	Trial preparation: prepare Marc Padgett cross, review pertinent transcripts and documents; review demonstratives.	8.70	\$3,915.00
01/23/2018	JVK	\$450	Trial preparation: finalize Mark Padgett's exam outline and review of transcripts, exhibits; revise Nicole Padgett's outline, review pertinent transcripts and documents.	9.40	\$4,230.00
01/24/2018	JVK	\$450	Trial preparation: work on Nicole Padgett direct, conduct mock cross of NP; revise outline and strategy; prepare and revise Fudge outline.	12.00	\$5,400.00
01/25/2018	JVK	\$450	Trial preparation: prepare for Steve Fudge cross, rehearse Steve Fudge cross on mock witness, revise outline accordingly; prepare opening, rehearse opening, revise opening; communications with Client	10.20	\$4,590.00
01/26/2018	JVK	\$450	Trial preparation: prepare for Bristen Breaux cross, rehearse Bristen Breaux cross on mock witness, revise outline accordingly; further prep on opening.	9.80	\$4,410.00
01/27/2018	JVK	\$450	Trial preparation: including opening for Daniel Rhyner and Steve Fudge.	11.00	\$4,950.00
01/28/2018	JVK	\$450	Trial preparation: including opening.	3.90	\$1,755.00
01/29/2018	JVK	\$450	Trial preparation: including opening and Daniel Rhyner, Fudge and Breaux examinations. Participate in trial.	14.00	\$6,300.00
01/30/2018	JVK	\$450	Trial preparation: for Rhyner, Breaux and Fudge examinations. Participate in trial.	13.60	\$6,120.00
01/31/2018	JVK	\$450	Trial preparation: including Nicole Padgett cross and closing; Attend trial.	9.80	\$4,410.00
02/01/2018	JVK	\$450	Trial preparation: closing statement, review available court transcripts, strategize re remaining witnesses.	11.80	\$5,310.00
02/02/2018	JVK	\$450	Preparation for last day of trial including closing argument. Attend final day of trial. Debrief post verdict with client.	13.00	\$5,850.00
02/05/2018	JVK	\$450	Internal communications / analysis re post-verdict issues, fee petition related work.	1.40	\$630.00
Total				560.80	\$252,360.00

Justin Driskell v. Summit Contracting Group, Inc.
Associate Time

Date	Staff	Rate	Description of Costs and Services	Time	Charge
02/22/2016	KPM	\$300	Research re REDA in preparation for communication with NCDOL.	0.40	\$120.00
02/22/2016	KPM	\$300	Draft / Edit Letter to NCDOL.	0.40	\$120.00
09/28/2016	KPM	\$300	Draft / Edit Complaint.	0.40	\$120.00
10/04/2016	KPM	\$300	Draft / Edit Complaint.	0.40	\$120.00
10/07/2016	KPM	\$300	Draft / Edit Complaint.	0.40	\$120.00
12/15/2016	KPM	\$300	Review / Analyze Motion to Dismiss.	0.40	\$120.00
12/15/2016	KPM	\$300	Draft / Edit outline for Response in Opposition for Motion to Dismiss.	0.40	\$120.00
12/19/2016	KPM	\$300	Draft / Edit Outline re Motion to Dismiss.	0.40	\$120.00
12/20/2016	KPM	\$300	Draft / Edit Response to Motion to Dismiss.	0.40	\$120.00
12/21/2016	KPM	\$300	Draft / Edit Response to Motion to Dismiss.	0.40	\$120.00
12/21/2016	KPM	\$300	Draft / Edit Brief in Opp. to Motion to Dismiss.	0.40	\$120.00
12/21/2016	KPM	\$300	Draft / Edit Response in Opp. to Motion to Dismiss.	0.40	\$120.00
01/10/2017	KPM	\$300	Review Order re Motion to Dismiss & Docket in Preparation for 26(f).	0.40	\$120.00
05/08/2017	KPM	\$300	Discussion with OC re Discovery Requests and Continuance.	0.40	\$120.00
05/30/2017	KPM	\$300	Draft / Edit 30(b)(6) Deposition Notice.	0.40	\$120.00
06/13/2017	SFH	\$300	Proof Meet & Confer Letter / Research.	2.30	\$690.00
06/27/2017	KPM	\$300	Draft / Edit Meet and Confer Response.	0.40	\$120.00
06/28/2017	KPM	\$300	Prepare Discovery Supplemental and Meet and Confer Letter Response.	0.40	\$120.00
07/05/2017	KPM	\$300	Review / Analyze Meet and Confer Letters and Discovery Requests.	0.40	\$120.00
07/06/2017	KPM	\$300	Draft / Edit Letter to Judge Keesler re MTC.	0.40	\$120.00
07/06/2017	KPM	\$300	Meet with JVK re Discovery Disputes.	0.40	\$120.00
07/06/2017	SFH	\$300	Edit Discovery Letter to Court.	0.30	\$90.00
07/18/2017	KPM	\$300	Draft / Edit Supplemental Discovery Responses.	0.40	\$120.00
07/26/2017	KPM	\$300	Draft / Edit Discovery Requests and Subpoenas.	0.40	\$120.00
07/26/2017	KPM	\$300	Prepare Additional Discovery Requests and Subpoenas.	0.40	\$120.00
07/31/2017	KPM	\$300	Discussion re Depositions and Remaining Discovery.	0.40	\$120.00
08/01/2017	KPM	\$300	Schedule Depositions.	0.20	\$60.00
08/01/2017	KPM	\$300	Schedule Mediation.	0.30	\$90.00
08/02/2017	KPM	\$300	Plan for Depositions and Mediation.	0.30	\$90.00
09/18/2017	SFH	\$300	Tom Driskell Prep / Deposition / Travel to and from.	8.20	\$2,460.00
10/09/2017	SFH	\$300	Summary Judgment Brief.	1.40	\$420.00
10/10/2017	SFH	\$300	Draft Memo in opposition to motion for summary judgment (MIOMSJ).	1.10	\$330.00
10/11/2017	SFH	\$300	MIOMSJ.	1.20	\$360.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
10/12/2017	KPM	\$300	Draft/Edit Opp. To Motion for Summary Judgment (MSJ).	2.20	\$660.00
10/15/2017	SFH	\$300	MIOMSJ Brief / Review deposition Transcripts.	2.00	\$600.00
10/16/2017	KPM	\$300	Prepare for McCutcheon Deposition.	1.00	\$300.00
10/16/2017	KPM	\$300	Attend McCutcheon Deposition.	1.50	\$450.00
10/16/2017	KPM	\$300	Review / Analyze Doc. Production in Prep for MSJ.	3.80	\$1,140.00
10/17/2017	KPM	\$300	Draft/Edit Response in Opp. MSJ.	7.30	\$2,190.00
10/17/2017	SFH	\$300	MIOMSJ Brief.	7.00	\$2,100.00
10/18/2017	KPM	\$300	Draft/Edit Response in Opp. MSJ.	6.80	\$2,040.00
10/18/2017	SFH	\$300	MIOMSJ Brief.	7.20	\$2,160.00
10/19/2017	KPM	\$300	Draft/Edit Response in Opp. MSJ.	7.10	\$2,130.00
10/19/2017	SFH	\$300	MIOMSJ Brief.	6.10	\$1,830.00
10/21/2017	KPM	\$300	Draft/Edit Summary in Judgement Brief.	2.00	\$600.00
10/22/2017	KPM	\$300	Draft/Edit Summary in Judgement Brief.	8.00	\$2,400.00
10/22/2017	SFH	\$300	Edited Brief.	3.90	\$1,170.00
10/23/2017	KPM	\$300	Draft/Edit Summary in Judgement Brief.	10.30	\$3,090.00
10/23/2017	SFH	\$300	Work on MSJ Brief.	10.10	\$3,030.00
10/31/2017	SFH	\$300	Edit Brief and Research.	1.00	\$300.00
11/27/2017	SFH	\$300	Calendar Pre-Trial Deadlines.	0.20	\$60.00
11/27/2017	SFH	\$300	Deadlines Research.	0.30	\$90.00
12/05/2017	SFH	\$300	Call with Client / Call with OC / Review Order.	1.20	\$360.00
12/11/2017	KPM	\$300	Research Jury Instructions.	1.70	\$510.00
12/11/2017	KPM	\$300	Meet with SFH re Pre-Trial Tasks.	0.30	\$90.00
12/11/2017	SFH	\$300	Meet with KPM re Pre-Trial Tasks.	0.30	\$90.00
12/12/2017	KPM	\$300	Research Jury Instructions.	0.50	\$150.00
12/12/2017	SFH	\$300	Joint Order Work.	0.30	\$90.00
12/12/2017	SFH	\$300	Draft Pre-Trial Order / Voir Dire / Emails with J. Gilbert / Research on Judge's Pretrial Rules / Call with OC.	4.30	\$1,290.00
12/13/2017	KPM	\$300	Research jury instructions	3.00	\$900.00
12/18/2017	KPM	\$300	Draft / Edit Jury Instructions.	3.70	\$1,110.00
12/18/2017	KPM	\$300	Draft / Edit Verdict Form.	2.30	\$690.00
12/18/2017	SFH	\$300	Work on Pre-Trial Order, Voir Dire, and Trial Brief	4.20	\$1,260.00
12/18/2017	SFH	\$300	Attempt to Locate Witnesses.	0.30	\$90.00
12/19/2017	KPM	\$300	Review/analyze transcripts in preparation for deposition designations in preparation for trial.	3.70	\$1,110.00
12/19/2017	KPM	\$300	Research Jury Instructions.	3.40	\$1,020.00
12/19/2017	KPM	\$300	Edit Pre Trial Order.	0.70	\$210.00
12/19/2017	KPM	\$300	Review Potential Trial Exhibits.	1.50	\$450.00
12/19/2017	SFH	\$300	Review and Edit Verdict Form and Jury Instructions.	1.80	\$540.00
12/19/2017	SFH	\$300	Review and Edit Voir Dire.	0.30	\$90.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
12/19/2017	SFH	\$300	Edit Pre Trial Order.	1.60	\$480.00
12/19/2017	KPM	\$300	Meet with JVK and SFH to discuss case.	0.30	\$90.00
12/19/2017	SFH	\$300	Meet with JVK and KPM to discuss case.	0.30	\$90.00
12/19/2017	SFH	\$300	Update Pre Trial Brief.	0.40	\$120.00
12/19/2017	SFH	\$300	Reviewed exhibits for marks, duplicates and other oddities.	0.70	\$210.00
12/19/2017	SFH	\$300	Search for Jury Instruction Language.	0.70	\$210.00
12/19/2017	SFH	\$300	Trial Brief.	1.20	\$360.00
12/19/2017	SFH	\$300	Call with Jennifer Spyker re Court's Damage Evidence Protocols from Eschert.	0.20	\$60.00
12/19/2017	SFH	\$300	Trial Brief.	1.20	\$360.00
12/20/2017	KPM	\$300	Prepare Exhibits for Disclosure.	2.70	\$810.00
12/20/2017	KPM	\$300	Draft / Edit Jury Instructions.	0.60	\$180.00
12/20/2017	KPM	\$300	Teleconference with counsel for Defendant regarding joint filings.	0.40	\$120.00
12/20/2017	KPM	\$300	Research Jury Instructions.	0.80	\$240.00
12/20/2017	KPM	\$300	Draft / Edit Pre Trial Order.	1.20	\$360.00
12/21/2017	KPM	\$300	Review/analyze deposition transcript of Nicole Padgett in preparation for trial.	0.60	\$180.00
12/20/2017	SFH	\$300	Call with Plaintiff re Damages.	0.20	\$60.00
12/20/2017	SFH	\$300	Work with Damages.	0.30	\$90.00
12/20/2017	SFH	\$300	Trial Brief.	2.30	\$690.00
12/20/2017	SFH	\$300	Final review of voir dire and pre-trial order. Work on Trial Brief. Call with Taylor Speer, Reggie, Hannah, Josh, and Kevin. Debrief of call with Josh and Kevin.	1.70	\$510.00
12/21/2017	KPM	\$300	Review / analyze Defendant's deposition designations.	1.30	\$390.00
12/21/2017	KPM	\$300	Review/analyze Defendant's proposed exhibits.	2.30	\$690.00
12/21/2017	KPM	\$300	Review/analyze deposition transcript of Tom Born in preparation for examination.	2.10	\$630.00
12/21/2017	KPM	\$300	Research Defendant's proposed jury instructions.	1.80	\$540.00
12/21/2017	KPM	\$300	Draft/edit joint jury instructions filing.	2.00	\$600.00
12/21/2017	SFH	\$300	Exhibits Review.	3.20	\$960.00
12/21/2017	SFH	\$300	Updated pre-trial order with new exhibit list; emailed to Taylor Speer	0.70	\$210.00
12/21/2017	SFH	\$300	Updated Jury Instructions and reviewed documents sent over by Defendant	4.10	\$1,230.00
12/22/2017	KPM	\$300	Draft/edit joint pretrial order.	0.50	\$150.00
12/22/2017	KPM	\$300	Edit Joint Voir Dire.	0.30	\$90.00
12/22/2017	KPM	\$300	Edit Trial Brief.	0.50	\$150.00
12/22/2017	KPM	\$300	Edit Joint Verdict Form Filing.	1.70	\$510.00
12/22/2017	KPM	\$300	Review / Analyze Def. Changes to Pre Trial Order.	0.60	\$180.00
12/22/2017	KPM	\$300	Prepare Exhibits for Submission to Court.	1.50	\$450.00
12/22/2017	KPM	\$300	Draft / Edit Proposed Jury Instructions Submission.	2.00	\$600.00
12/22/2017	KPM	\$300	Draft / Edit Verdict Form Submission.	0.30	\$90.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
12/22/2017	KPM	\$300	Research Right to a Jury Trial on Back Pay.	2.00	\$600.00
12/22/2017	KPM	\$300	Review/analyze exhibits for objections and in preparation for submission to Court.	1.50	\$450.00
12/22/2017	SFH	\$300	Draft Pre-Trial Order; Jury Instructions, Voir Dire, and exhibits	4.00	\$1,200.00
12/22/2017	SFH	\$300	Revise Jury Instructions and Review New PTO.	1.00	\$300.00
12/26/2017	KPM	\$300	Review/analyze Defendant's Motion in Limine.	2.00	\$600.00
12/26/2017	KPM	\$300	Draft/edit response in opposition to Defendant's Motion in Limine.	3.20	\$960.00
12/26/2017	SFH	\$300	Direct Outline Work.	2.10	\$630.00
12/27/2017	KPM	\$300	Review Exhibits Prepared by Defendant	1.40	\$420.00
12/27/2017	KPM	\$300	Review/analyze deposition of Zach Graham in preparation for cross exam.	2.30	\$690.00
12/27/2017	KPM	\$300	Prepare Exhibit Filing with Court.	0.50	\$150.00
12/27/2017	KPM	\$300	Draft/edit/file amended proposed pretrial order.	3.00	\$900.00
12/27/2017	KPM	\$300	Review Phone Records.	1.80	\$540.00
12/27/2017	KPM	\$300	Research issues raised by Defendant's motions in limine.	2.50	\$750.00
12/27/2017	SFH	\$300	Draft Response to MIL.	2.10	\$630.00
12/28/2017	KPM	\$300	Draft/edit response in opposition to motions in limine.	2.10	\$630.00
12/28/2017	KPM	\$300	Review/analyze deposition transcripts in preparation for trial.	3.40	\$1,020.00
12/28/2017	KPM	\$300	Research standard for excluding witnesses in response to defense motion to quash/exclude.	1.70	\$510.00
12/28/2017	KPM	\$300	Prepare Exhibits for Trial.	1.50	\$450.00
12/28/2017	SFH	\$300	Work on Plaintiff Direct.	0.80	\$240.00
12/28/2017	SFH	\$300	Reviewed Records, Created Chart, Call with Plaintiff.	3.30	\$990.00
12/28/2017	SFH	\$300	Proofed motion in limine response; filed motion in limine.	1.00	\$300.00
12/29/2017	KPM	\$300	Discussion with witness Chris Lopez.	0.10	\$30.00
12/29/2017	KPM	\$300	Prepare Trial Exhibits.	1.10	\$330.00
12/29/2017	KPM	\$300	Review/analyze medical records in preparation for plaintiff direct exam.	0.50	\$150.00
12/29/2017	KPM	\$300	Review/analyze discovery responses in preparation for trial.	1.30	\$390.00
12/29/2017	SFH	\$300	Prepare for Meeting w/ Plaintiff.	2.50	\$750.00
12/29/2017	SFH	\$300	Prepare Plaintiff.	5.30	\$1,590.00
12/29/2017	SFH	\$300	Review and prepare new exhibits; send exhibits to opposing counsel	0.70	\$210.00
12/30/2017	KPM	\$300	Draft/edit response in opposition to motion to quash/exclude.	0.80	\$240.00
12/30/2017	SFH	\$300	Draft Response to Strike Motion.	5.50	\$1,650.00
12/31/2017	SFH	\$300	Response to motion to quash; filed it; updated exhibits; emailed exhibits to OC.	2.70	\$810.00
01/01/2018	KPM	\$300	Review/analyze pleadings re motions in limine in preparation for oral argument.	1.80	\$540.00
01/01/2018	KPM	\$300	Review/analyze comparator evidence in preparation for oral argument	1.50	\$450.00
01/01/2018	KPM	\$300	Review/analyze Defense objections to voir dire in preparation for oral argument.	0.80	\$240.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
01/01/2018	SFH	\$300	Prep for pre-trial conference; meeting on voir dire.	6.60	\$1,980.00
01/02/2018	KPM	\$300	Attend Pre Trial Conference and Docket Call.	1.50	\$450.00
01/02/2018	KPM	\$300	Plan for Jury Selection.	1.50	\$450.00
01/02/2018	KPM	\$300	Prepare for Trial.	0.50	\$150.00
01/02/2018	KPM	\$300	Prepare for Tom Born Examination.	1.80	\$540.00
01/02/2018	KPM	\$300	Prepare for Zach Graham Examination.	0.40	\$120.00
01/02/2018	SFH	\$300	Prepare for Pre Trial Conference and argument on pretrial motions.	1.20	\$360.00
01/02/2018	SFH	\$300	Pre-trial conference—travel to and from, lunch meeting on case	3.30	\$990.00
01/02/2018	SFH	\$300	Voir dire work, practice with group, updated questions	1.50	\$450.00
01/03/2018	KPM	\$300	Attend Jury Selection.	4.00	\$1,200.00
01/03/2018	KPM	\$300	Prepare Client Testimony.	1.00	\$300.00
01/03/2018	KPM	\$300	Prepare for cross-examination of Zach Graham.	0.80	\$240.00
01/03/2018	KPM	\$300	Plan Witnesses to call and trial strategy.	1.20	\$360.00
01/03/2018	KPM	\$300	Review/analyze Bristen Breaux transcript.	1.00	\$300.00
01/03/2018	SFH	\$300	Meet with KPM and JVK to plan for trial	1.00	\$300.00
01/03/2018	SFH	\$300	Attend Jury Selection.	4.00	\$1,200.00
01/03/2018	SFH	\$300	Prep Plaintiff.	1.00	\$300.00
01/03/2018	SFH	\$300	R Malsch research for cross outline	0.90	\$270.00
01/04/2018	KPM	\$300	Review / Analyze Rhyner Transcript.	1.50	\$450.00
01/04/2018	KPM	\$300	Review/analyze video deposition of Nicole Padgett	1.00	\$300.00
01/04/2018	KPM	\$300	Review/analyze video deposition of Tom Born.	1.00	\$300.00
01/04/2018	KPM	\$300	Research Dan Rhyner's criminal history	1.30	\$390.00
01/04/2018	KPM	\$300	Review/analyze Steve Fudge/Rebecca Malsch recording.	0.40	\$120.00
01/04/2018	KPM	\$300	Review/analyze witness' Facebook accounts in preparation for trial.	0.90	\$270.00
01/04/2018	KPM	\$300	Review/analyze Rebecca Malsch Transcript in preparation for trial.	1.00	\$300.00
01/04/2018	KPM	\$300	Review/analyze Steve Fudge Transcript in preparation for trial.	1.70	\$510.00
01/04/2018	SFH	\$300	Review Breaux and Malsch transcripts; meet with Kevin and Josh on focus group; meet with Kevin and Josh on Breaux.	3.60	\$1,080.00
01/05/2018	KPM	\$300	Review/analyze summary judgment record in preparation for motions and trial.	1.20	\$360.00
01/05/2018	KPM	\$300	Review/analyze exhibits in preparation for trial.	1.50	\$450.00
01/05/2018	KPM	\$300	Review/analyze Dan Rhyner deposition transcript in preparation for trial.	1.20	\$360.00
01/05/2018	SFH	\$300	Watched Justin Driskell dep; made sound clips from Fudge tape	4.00	\$1,200.00
01/06/2018	SFH	\$300	Watch Plaintiff's Deposition.	4.00	\$1,200.00
01/07/2018	SFH	\$300	Watch Plaintiff's Deposition.	1.60	\$480.00
01/08/2018	SFH	\$300	Review plaintiff deposition video; update notes on deposition video; started making deposition video clips for client prep.	5.30	\$1,590.00
01/08/2018	SFH	\$300	Prepare CrossVideos.	2.50	\$750.00
01/09/2018	KPM	\$300	Prepare for cross exam of Zach Graham in preparation for trial.	1.20	\$360.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
01/09/2018	KPM	\$300	Prepare for cross exam of Tom Born in preparation for trial.	1.50	\$450.00
01/09/2018	KPM	\$300	Research jury instructions in preparation for trial.	1.20	\$360.00
01/09/2018	SFH	\$300	Worked on Justin's direct outline; reviewed Tom Driskell deposition.; updated communications log.	8.50	\$2,550.00
01/10/2018	KPM	\$300	Review/analyze Nicole Padgett deposition transcript in preparation for trial.	2.30	\$690.00
01/10/2018	KPM	\$300	Prepare Cross Examination Outline for Focus Group.	1.50	\$450.00
01/10/2018	KPM	\$300	Edit Proposed Pretrial Order.	0.30	\$90.00
01/10/2018	KPM	\$300	Review/analyze exhibits in preparation for trial.	0.60	\$180.00
01/10/2018	KPM	\$300	Attend Cargill Trial in preparation for trial.	1.50	\$450.00
01/10/2018	KPM	\$300	Plan for Focus Group.	1.00	\$300.00
01/10/2018	KPM	\$300	Prepare cross examination outlines in preparation for trial.	1.50	\$450.00
01/10/2018	SFH	\$300	Updated J Driskell outline, update exhibits, send exhibits and update PTO to opposing counsel, meeting on OSHA exhibit, edited and cut N Padgett video, direct practice with Justin, conversation with Justin on case.	10.80	\$3,240.00
01/11/2018	KPM	\$300	Prepare for cross examination of Zach Graham	1.60	\$480.00
01/11/2018	KPM	\$300	Review/analyze phone record demonstrative	0.50	\$150.00
01/11/2018	KPM	\$300	Prepare for cross-exam of Tom Born	0.80	\$240.00
01/11/2018	KPM	\$300	Review/analyze exhibits in preparation for trial.	1.20	\$360.00
01/11/2018	KPM	\$300	Prepare mock defense outline for trial preparation and witness preparation.	2.30	\$690.00
01/11/2018	KPM	\$300	Research.	1.30	\$390.00
01/12/2018	KPM	\$300	Prepare Exhibits for Trial	1.00	\$300.00
01/12/2018	KPM	\$300	Prepare exhibits and outlines for focus group.	1.70	\$510.00
01/12/2018	KPM	\$300	Review/analyze exhibits in preparation for trial.	0.50	\$150.00
01/12/2018	SFH	\$300	Edited Nicole Padgett video; updated J Driskell trial outline; created J Driskell focus group outline; created T Driskell focus group outline; communications with Matt and Brett; finalized demonstrative exhibit; meeting on affirmative defenses/charge sheet	11.00	\$3,300.00
01/13/2018	KPM	\$300	Conduct focus group testing arguments and witness examination plans for trial	7.00	\$2,100.00
01/13/2018	KPM	\$300	Prepare Client for Trial.	1.50	\$450.00
01/13/2018	KPM	\$300	Prepare Tom Driskell for Trial.	0.50	\$150.00
01/13/2018	SFH	\$300	Focus Group Prep / Attend.	12.00	\$3,600.00
01/15/2018	KPM	\$300	Draft / Edit Verdict Form.	0.50	\$150.00
01/15/2018	KPM	\$300	Review Discovery.	1.20	\$360.00
01/15/2018	KPM	\$300	Review/analyze findings of focus group in preparation for trial.	3.00	\$900.00
01/15/2018	SFH	\$300	Review focus group video, researched fringe benefits, updated outline, updated demonstratives, created new demonstratives	7.00	\$2,100.00
01/16/2018	KPM	\$300	Draft / Edit Pre Trial Order.	0.80	\$240.00
01/16/2018	KPM	\$300	Interview Christopher Lopez.	0.30	\$90.00
01/16/2018	KPM	\$300	Review/analyze McCutcheon transcript in preparation for video in trial	0.60	\$180.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
01/16/2018	KPM	\$300	Review Blunn Transcript in Prep for Video at Trial.	0.40	\$120.00
01/16/2018	KPM	\$300	Prepare Exhibits for Trial.	0.50	\$150.00
01/16/2018	KPM	\$300	Plan for Opening Statement.	0.40	\$120.00
01/16/2018	KPM	\$300	Plan for / create demonstrative exhibits.	0.50	\$150.00
01/16/2018	KPM	\$300	Meet and Confer with OC re Objections and Stipulations.	0.30	\$90.00
01/16/2018	KPM	\$300	Review/analyze Defendant's new 26(a) Disclosures	0.20	\$60.00
01/16/2018	SFH	\$300	Updated exhibits; emailed Taylor; updated PTO; call with Justin; reviewed complaint	8.20	\$2,460.00
01/17/2018	KPM	\$300	Research OSHA Standards on Drinking at Work.	2.00	\$600.00
01/17/2018	KPM	\$300	Draft / Edit Memo re Alcohol At Work and OSHA.	1.30	\$390.00
01/18/2018	KPM	\$300	Draft / Edit Cross of Tom Born.	1.30	\$390.00
01/18/2018	KPM	\$300	Draft / Edit Cross of Zach Graham.	0.70	\$210.00
01/18/2018	KPM	\$300	Prepare PD Report Exhibits.	0.30	\$90.00
01/18/2018	KPM	\$300	Produce PD Exhibit to Defendant.	0.10	\$30.00
01/18/2018	KPM	\$300	Gather and prepare photo exhibits of relevant Summit job sites.	0.50	\$150.00
01/18/2018	KPM	\$300	Review/analyze records of Summit OSHA violations in Charlotte in preparation for trial.	0.50	\$150.00
01/18/2018	KPM	\$300	Prepare for Opening Statement.	0.50	\$150.00
01/19/2018	KPM	\$300	Review/analyze McCutcheon Deposition designations.	0.50	\$150.00
01/19/2018	KPM	\$300	Communications with defense counsel re Dr. McCutcheon.	0.20	\$60.00
01/19/2018	KPM	\$300	Plan for/prepare opening argument materials.	0.30	\$90.00
01/20/2018	SFH	\$300	Prep for call; call to practice direct; update outline	3.40	\$1,020.00
01/22/2018	KPM	\$300	Review / Analyze Phone Records.	1.50	\$450.00
01/22/2018	KPM	\$300	Prepare Exhibit Display Program for trial.	1.20	\$360.00
01/22/2018	KPM	\$300	Draft/edit demonstrative aids in preparation for trial	0.80	\$240.00
01/22/2018	SFH	\$300	Reviewed phone records, updated demonstratives, spoke with Justin about phone records, updated JD outline, updated TD outline, call with TD	5.20	\$1,560.00
01/23/2018	KPM	\$300	Plan Witness Order and Topics for Trial.	1.20	\$360.00
01/23/2018	KPM	\$300	Draft/edit outline for examination of Tom Born in preparation for trial.	0.80	\$240.00
01/23/2018	KPM	\$300	Draft/edit outline for examination of Zach Graham in preparation for trial.	0.50	\$150.00
01/23/2018	KPM	\$300	Draft/edit outline for examination of Chris Lopez in preparation for trial.	0.30	\$90.00
01/23/2018	KPM	\$300	Prepare Exhibits for trial.	0.60	\$180.00
01/23/2018	KPM	\$300	Review/analyze phone records in preparation for trial.	1.00	\$300.00
01/23/2018	KPM	\$300	Review/analyze motions in limine in preparation for trial.	1.50	\$450.00
01/23/2018	KPM	\$300	Research 404(b) cases in preparation for trial.	2.30	\$690.00
01/23/2018	KPM	\$300	Review/analyze motions in limine in preparation for trial.	1.50	\$450.00
01/23/2018	KPM	\$300	Review/analyze phone records in preparation for trial.	1.00	\$300.00
01/23/2018	KPM	\$300	Prepare exhibits for trial.	0.60	\$180.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
01/23/2018	KPM	\$300	Draft/edit outline for examination of Chris Lopez in preparation for trial.	0.30	\$90.00
01/23/2018	KPM	\$300	Draft/edit outline for examination of Zach Graham in preparation for trial.	0.50	\$150.00
01/23/2018	KPM	\$300	Draft/edit outline for examination of Tom Born in preparation for trial.	0.80	\$240.00
01/23/2018	KPM	\$300	Plan witness order and topics in preparation for trial.	1.20	\$360.00
01/23/2018	SFH	\$300	work through trial goals for Justin, Tom Driskell, Pam, and Greg. Work on emotional distress demonstrative.	2.10	\$630.00
01/24/2018	KPM	\$300	Prepare exhibit list in preparation for trial.	0.50	\$150.00
01/24/2018	KPM	\$300	Review/analyze jury instructions in preparation for trial.	0.50	\$150.00
01/24/2018	KPM	\$300	Review/analyze exhibits in preparation for trial.	0.80	\$240.00
01/24/2018	KPM	\$300	Prepare for cross exam of Nicole Padgett in preparation for trial.	1.50	\$450.00
01/24/2018	KPM	\$300	Review/analyze transcripts in preparation for meet and confer re video depositions.	0.60	\$180.00
01/24/2018	KPM	\$300	Meet and Confer regarding video depositions.	0.20	\$60.00
01/24/2018	SFH	\$300	Reviewed Malsch Tran, created Malsch cross outline, updated exhibits, sent exhibits to OC, practice Josh's Padgett cross, spoke with Justin, updated jury instructions, emailed jury instruction to OC.	11.50	\$3,450.00
01/25/2018	KPM	\$300	Prepare opening statement.	0.50	\$150.00
01/25/2018	KPM	\$300	Prepare for cross exam of Steve Fudge in preparation for trial.	1.00	\$300.00
01/25/2018	KPM	\$300	Prepare for cross exam of Tom Born in preparation for trial.	0.80	\$240.00
01/25/2018	KPM	\$300	Create audio clips in preparation for trial.	0.40	\$120.00
01/25/2018	KPM	\$300	Draft/edit exhibits and witness list for trial.	0.30	\$90.00
01/25/2018	KPM	\$300	Create audio clips in preparation for trial.	0.50	\$150.00
01/26/2018	KPM	\$300	Research Damages in preparation for trial.	0.50	\$150.00
01/26/2018	KPM	\$300	Prepare and File Exhibit and Witness Lists.	0.50	\$150.00
01/26/2018	KPM	\$300	Prepare for cross exam of Dan Rhyner.	1.00	\$300.00
01/26/2018	KPM	\$300	Prepare for cross exam of Zach Graham.	0.60	\$180.00
01/26/2018	KPM	\$300	Prepare for cross exam of Tom Born.	1.00	\$300.00
01/26/2018	KPM	\$300	Review/analyze proposed jury instructions in preparation for trial.	1.20	\$360.00
01/26/2018	KPM	\$300	Prepare transcripts for trial.	0.50	\$150.00
01/26/2018	KPM	\$300	Draft/edit self-defense jury instruction.	0.30	\$90.00
01/26/2018	KPM	\$300	Research self-defense jury instructions in preparation for trial.	0.80	\$240.00
01/26/2018	KPM	\$300	Prepare media clips for trial.	0.70	\$210.00
01/26/2018	SFH	\$300	Zach Graham practice with Kevin, Tom Born practice with Kevin, finalized jury instructions, sent jury instructions back to Hannah, filed jury instructions, spoke with client, incorporated new jury instruction, Dan Rhyner practice, reviewed witness list, updated JD direct outline.	8.20	\$2,460.00
01/27/2018	KPM	\$300	Review/analyze Marc Padgett transcript in preparation for trial.	1.50	\$450.00
01/27/2018	KPM	\$300	Draft/edit cross outline for Marc Padgett.	1.20	\$360.00
01/27/2018	KPM	\$300	Prepare Justin Driskell for trial.	2.00	\$600.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
01/27/2018	SFH	\$300	Updated direct for Justin.	0.70	\$210.00
01/27/2018	SFH	\$300	Updated Driskell outline—cut and added exhibit numbers	1.00	\$300.00
01/27/2018	SFH	\$300	Met with Justin.	0.50	\$150.00
01/28/2018	KPM	\$300	Edit Blunn designations for time in preparation for trial.	0.60	\$180.00
01/28/2018	KPM	\$300	Review/analyze Marc Padgett deposition in preparation for trial.	1.80	\$540.00
01/28/2018	KPM	\$300	Prepare damages calculations.	2.00	\$600.00
01/28/2018	KPM	\$300	Prepare David Blunn deposition video with new designations.	1.50	\$450.00
01/28/2018	KPM	\$300	Prepare for Marc Padgett cross.	2.50	\$750.00
01/28/2018	SFH	\$300	Prepared for JD direct—incorporated all exhibits and potential objections into outline; studied hearsay rules.	1.40	\$420.00
01/28/2018	SFH	\$300	Assisted editing Blunn video.	0.50	\$150.00
01/29/2018	KPM	\$300	Prepare Born cross for trial.	1.10	\$330.00
01/29/2018	KPM	\$300	Prepare for trial.	1.50	\$450.00
01/29/2018	KPM	\$300	Attend Trial.	8.00	\$2,400.00
01/29/2018	SFH	\$300	Prepare for following day; T Driskell prep.	1.10	\$330.00
01/29/2018	SFH	\$300	Attend Trial.	8.00	\$2,400.00
01/29/2018	SFH	\$300	Prep for J Driskell Direct.	1.50	\$450.00
01/30/2018	KPM	\$300	Review/analyze Blunn and McCutcheon transcripts/videos in preparation for trial.	1.50	\$450.00
01/30/2018	KPM	\$300	Prepare Born, Graham and Marc Padgett crosses for trial.	2.00	\$600.00
01/30/2018	KPM	\$300	Attend Trial.	8.20	\$2,460.00
01/30/2018	SFH	\$300	Attend Trial.	8.20	\$2,460.00
01/30/2018	SFH	\$300	Prepare for T Driskell Direct.	1.50	\$450.00
01/31/2018	KPM	\$300	Attend Trial.	8.00	\$2,400.00
01/31/2018	KPM	\$300	Prepare for cross exam of Tom Born.	0.80	\$240.00
01/31/2018	KPM	\$300	Review/analyze jury instructions in preparation for charge conference.	2.00	\$600.00
01/31/2018	SFH	\$300	Updated Pam Rogers outline.	0.50	\$150.00
01/31/2018	SFH	\$300	Worked on jury instructions.	2.00	\$600.00
01/31/2018	SFH	\$300	Attend Trial.	8.00	\$2,400.00
02/01/2018	KPM	\$300	Research Comparator law for jury instruction hearing.	0.50	\$150.00
02/01/2018	KPM	\$300	Prepare David Blunn designations for trial.	0.70	\$210.00
02/01/2018	KPM	\$300	Prepare exhibits for trial.	0.50	\$150.00
02/01/2018	KPM	\$300	Prepare for cross exam of Marc Padgett.	1.40	\$420.00
02/01/2018	KPM	\$300	Meet and Confer regarding jury instructions and incorporate Court's rulings into instructions.	1.30	\$390.00
02/01/2018	KPM	\$300	Appear in Court for jury instruction meet and confer and hearing with Court.	3.30	\$990.00
02/01/2018	KPM	\$300	Prepare for jury instruction argument.	1.50	\$450.00
02/01/2018	KPM	\$300	Attend jury instruction meet and confer.	2.90	\$870.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
02/01/2018	SFH	\$300	Updated and printed outlines.	0.40	\$120.00
02/01/2018	SFH	\$300	Research Lenzer-based claim for reporting to police.	0.20	\$60.00
02/01/2018	SFH	\$300	Rebecca Malsch outline update.	0.50	\$150.00
02/01/2018	SFH	\$300	Update and calculate damages for Plaintiff; meet on damages with Kevin and Josh; prepare demonstrative on damages.	1.50	\$450.00
02/01/2018	SFH	\$300	post-charge conference meet and confer on instructions with OCs re Judge Whitney rulings.	1.30	\$390.00
02/01/2018	SFH	\$300	Charge conference, including negotiating with OCs on instructions.	3.30	\$990.00
02/01/2018	SFH	\$300	Prepare for jury instruction conference.	1.50	\$450.00
02/01/2018	SFH	\$300	Meeting with OCs on jury instructions.	2.90	\$870.00
02/02/2018	KPM	\$300	Attend jury instruction hearing.	1.00	\$300.00
02/02/2018	KPM	\$300	Attend Trial.	10.00	\$3,000.00
02/02/2018	SFH	\$300	Attend Trial.	10.00	\$3,000.00
02/02/2018	SFH	\$300	Charge conference, continued.	1.00	\$300.00
02/07/2018	KPM	\$300	Compile Billing Records for Motion for Attorney's Fees and Bill of Costs	1.50	\$450.00
02/08/2018	KPM	\$300	Draft/edit Motion for Attorney's Fees and Costs	0.80	\$240.00
02/09/2018	KPM	\$300	Draft/edit Motion for Attorney's Fees and Costs	0.50	\$150.00
02/12/2018	KPM	\$300	Research for Motion for Attorney's Fees and Costs	1.70	\$510.00
02/14/2018	KPM	\$300	Draft/edit Motion for Attorney's Fees and Costs	1.50	\$450.00
02/15/2018	KPM	\$300	Draft/edit Motion for Attorney's Fees and Costs	2.30	\$690.00
02/16/2018	KPM	\$300	Draft/edit Draft affidavits and reach out to local attorneys in preparation for Motion for Attorney's Fees and Costs	1.20	\$360.00
02/19/2018	KPM	\$300	Draft/edit Motion for Attorney's Fees and Costs	1.10	\$330.00
02/19/2018	SFH	\$300	Research re rule 58 and 79 re meaning of "entry" in preparation for fee petition	0.60	\$180.00
Total				630.80	\$189,240.00

Justin Driskell v. Summit Contracting Group, Inc.
Senior Support Staff Time

Date	Staff	Rate	Description of Costs and Services	Time	Charge
08/10/2015	MJ	\$150	Opened Case File.	0.50	\$75.00
10/07/2015	MJ	\$150	Proof LOR.	0.20	\$30.00
01/07/2016	MJ	\$150	Draft NCDOL Questionare.	2.00	\$300.00
02/22/2016	NM	\$150	Update Client File.	0.10	\$15.00
02/23/2016	NM	\$150	Proof and Send NCDOL Response Letter.	0.40	\$60.00
07/22/2016	NM	\$150	Background Search.	0.10	\$15.00
07/26/2016	NM	\$150	Background Search.	0.30	\$45.00
08/05/2016	NM	\$150	Review and Revise Term for Representation.	0.20	\$30.00
10/07/2016	NM	\$150	Communicate with Client.	0.20	\$30.00
10/19/2016	MJ	\$150	Edit Complaint.	0.70	\$105.00
10/20/2016	MJ	\$150	Draft Cover Sheets.	0.20	\$30.00
10/21/2016	MJ	\$150	Review Complaint.	0.60	\$90.00
10/24/2016	MJ	\$150	File Complaint.	0.70	\$105.00
11/30/2016	NM	\$150	Update Client File.	0.20	\$30.00
12/02/2016	NM	\$150	Update Client File.	0.10	\$15.00
12/05/2016	MJ	\$150	Draft Plaintiff Discovery Requests.	1.60	\$240.00
12/09/2016	NM	\$150	Update Client File.	0.10	\$15.00
12/13/2016	NM	\$150	Update Client File.	0.10	\$15.00
12/14/2016	NM	\$150	Review File.	0.10	\$15.00
12/22/2016	MJ	\$150	Draft REDA Charge.	0.40	\$60.00
01/04/2017	NM	\$150	Update Client File.	0.10	\$15.00
01/10/2017	MJ	\$150	Communicate with Client.	0.20	\$30.00
01/10/2017	NM	\$150	Update Client File.	0.10	\$15.00
01/23/2017	NM	\$150	Update Client File.	0.10	\$15.00
02/17/2017	MJ	\$150	Rule 26 Initial Disclosures.	0.10	\$15.00
02/17/2017	NM	\$150	Update Client File.	0.10	\$15.00
02/27/2017	NM	\$150	Update Client File.	0.10	\$15.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
03/31/2017	MJ	\$150	Proof Discovery Requests / Add Document Production Requests.	1.30	\$195.00
04/06/2017	MJ	\$150	Finalize Discovery Requests and Send to OC.	0.30	\$45.00
04/10/2017	NM	\$150	Update Client File.	0.10	\$15.00
04/20/2017	MJ	\$150	Request Medical Bills.	0.20	\$30.00
05/22/2017	MJ	\$150	Review File for Background Checks.	0.20	\$30.00
05/22/2017	NM	\$150	Background Search.	0.20	\$30.00
05/22/2017	NM	\$150	Send Request for Police Records.	0.10	\$15.00
05/23/2017	NM	\$150	Update Client File.	0.10	\$15.00
05/26/2017	MJ	\$150	Update Client File.	0.20	\$30.00
05/30/2017	MJ	\$150	Edit 30(b)(6).	0.40	\$60.00
06/06/2017	NM	\$150	Update Client File.	0.10	\$15.00
06/12/2017	MJ	\$150	Draft Letter re Summit Depositions.	0.10	\$15.00
06/12/2017	MJ	\$150	Update Client File.	0.10	\$15.00
06/13/2017	MJ	\$150	Draft Subpoenas.	1.20	\$180.00
06/19/2017	NM	\$150	Prepare Notebook.	0.20	\$30.00
06/21/2017	MJ	\$150	Edit, Print and Send Out Subpoenas.	0.30	\$45.00
06/22/2017	MJ	\$150	Review Supplemental Discovery Responses.	0.20	\$30.00
06/26/2017	MJ	\$150	Update Client File.	0.10	\$15.00
06/26/2017	NM	\$150	Update Client File.	0.10	\$15.00
06/27/2017	NM	\$150	Review File and Communicate with Court Reporter.	0.20	\$30.00
06/28/2017	MJ	\$150	Scan In and Send Out Supp. Responses.	0.40	\$60.00
06/30/2017	NM	\$150	Update Client File.	0.10	\$15.00
07/05/2017	MJ	\$150	Update OC re Subpoena.	0.10	\$15.00
07/05/2017	MJ	\$150	Update Docket Dates per Court Order.	0.10	\$15.00
07/06/2017	MJ	\$150	Proof Letter to Court.	0.10	\$15.00
07/07/2017	MJ	\$150	Communicate with OC re New 30(b)(6).	0.10	\$15.00
07/10/2017	MJ	\$150	Draft Supplemental Response.	0.10	\$15.00
07/10/2017	NM	\$150	Send Subpoena.	0.10	\$15.00
07/18/2017	MJ	\$150	Draft Notice of Depositions / Communicate with OC / Send out Third Supp. Responses.	1.90	\$285.00
07/19/2017	NM	\$150	Research.	0.50	\$75.00
07/20/2017	NM	\$150	Travel Arrangements.	0.50	\$75.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
07/25/2017	MJ	\$150	Bate Stamp and Send Out Responsive Documents.	0.40	\$60.00
07/25/2017	MJ	\$150	Deposition Preparation.	2.60	\$390.00
07/25/2017	NM	\$150	Send Subpoena to Rhyner.	0.10	\$15.00
07/26/2017	MJ	\$150	Interview with Tom Driskell.	0.50	\$75.00
07/26/2017	MJ	\$150	Draft Subpoena and Attachment to Company.	0.50	\$75.00
07/26/2017	MJ	\$150	Work on Certified Mail for Subpoenas.	0.70	\$105.00
07/26/2017	MJ	\$150	Draft Subpoenas.	1.10	\$165.00
07/26/2017	MJ	\$150	Proof Subcontractor Subpoenas.	0.40	\$60.00
07/26/2017	MJ	\$150	Draft 2nd Set of Discovery Requests.	0.60	\$90.00
07/26/2017	NM	\$150	Research re Duvall County Court Documents.	0.30	\$45.00
07/26/2017	NM	\$150	Obtain Court Documents.	0.50	\$75.00
07/26/2017	NM	\$150	Deposition Preparation.	1.00	\$150.00
07/27/2017	MJ	\$150	Communicate with Court Reporter.	0.10	\$15.00
07/27/2017	MJ	\$150	Review and Update Client File.	0.40	\$60.00
07/27/2017	MJ	\$150	Draft Subpoenas and Send to OC.	1.20	\$180.00
07/27/2017	NM	\$150	Research.	0.30	\$45.00
07/28/2017	MJ	\$150	Draft and Send Out Certified Mail re Subpoenas.	1.20	\$180.00
07/28/2017	MJ	\$150	Draft New F/U Letter to Subcontractors and Send Out to OC and Individuals.	1.30	\$195.00
07/31/2017	MJ	\$150	Draft Joint Stipulation.	0.20	\$30.00
07/31/2017	NM	\$150	Communicate with Mediator.	0.10	\$15.00
08/03/2017	NM	\$150	Update Client File.	0.10	\$15.00
08/04/2017	NM	\$150	Update Client File.	0.10	\$15.00
08/08/2017	NM	\$150	Communicate with Mediator.	0.10	\$15.00
08/08/2017	NM	\$150	Prepare Table.	0.10	\$15.00
08/09/2017	NM	\$150	Communicate with Mediator.	0.10	\$15.00
08/09/2017	NM	\$150	Update Client File.	0.20	\$30.00
08/10/2017	NM	\$150	Communicate with Vendor re Subpoenaed Documents.	0.10	\$15.00
08/10/2017	NM	\$150	Update Client File.	0.10	\$15.00
08/14/2017	NM	\$150	Calculate Figures for Invoicing.	0.20	\$30.00
08/16/2017	MJ	\$150	Scan In Documents and Update Client File.	0.30	\$45.00
08/21/2017	MJ	\$150	Draft Chart re Subpoena Responses.	0.20	\$30.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
08/21/2017	MJ	\$150	Bate Stamp New Documents / Send to OC.	0.20	\$30.00
08/23/2017	NM	\$150	Update Client File.	0.10	\$15.00
08/25/2017	MJ	\$150	Draft New HIPAA Release.	0.20	\$30.00
08/28/2017	MJ	\$150	Proof and Send Out HIPAA to be Signed.	0.30	\$45.00
09/01/2017	NM	\$150	Update Client File.	0.10	\$15.00
09/05/2017	MJ	\$150	Scan in Defendant Deposition Exhibits.	0.20	\$30.00
09/05/2017	MJ	\$150	Send out F/U Letters with Subpoenas.	0.50	\$75.00
09/12/2017	MJ	\$150	Send Out 2nd Requests.	0.20	\$30.00
09/14/2017	MJ	\$150	Update Client File.	0.10	\$15.00
09/15/2017	MJ	\$150	Prepare and Send Documents to Tom Driskell.	0.50	\$75.00
09/20/2017	MJ	\$150	Update Client File with Subpoenas.	0.10	\$15.00
09/22/2017	NM	\$150	Communicate with Client.	0.10	\$15.00
09/25/2017	NM	\$150	Deposition Set Up and Preparation.	0.70	\$105.00
09/25/2017	NM	\$150	Calculate Figures for Invoicing.	0.20	\$30.00
09/26/2017	NM	\$150	Scan and Save Documents.	0.10	\$15.00
09/28/2017	MJ	\$150	Send out 4th Supp. Response Requests.	0.20	\$30.00
09/28/2017	NM	\$150	Communicate with Court Reporter.	0.10	\$15.00
09/29/2017	NM	\$150	Prepare and Send Discovery.	0.40	\$60.00
10/02/2017	NM	\$150	Update Client File.	0.20	\$30.00
10/03/2017	MJ	\$150	Notebook for MSJ.	0.40	\$60.00
10/05/2017	NM	\$150	Communicate with Staff re Case.	0.20	\$30.00
10/06/2017	NM	\$150	Set up Remote Deposition.	0.20	\$30.00
10/06/2017	NM	\$150	Attend Deposition Prep Call.	0.20	\$30.00
10/09/2017	MJ	\$150	Draft New Notice of Depositions / Get Out.	0.40	\$60.00
10/11/2017	NM	\$150	Coordinate Deposition with Court Reporter.	0.30	\$45.00
10/11/2017	NM	\$150	Research Travel.	0.60	\$90.00
10/13/2017	MJ	\$150	Deposition. Prep.	3.00	\$450.00
10/13/2017	NM	\$150	Make Travel Arrangements.	0.70	\$105.00
10/16/2017	MJ	\$150	Deposition. Prep.	6.90	\$1,035.00
10/16/2017	NM	\$150	Mail Exhibits to Court Reporter.	0.30	\$45.00
10/16/2017	NM	\$150	Update Client File.	0.10	\$15.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
10/16/2017	NM	\$150	Deposition. Prep.	0.30	\$45.00
10/17/2017	NM	\$150	Communicate with Court Reporter.	0.20	\$30.00
10/17/2017	NM	\$150	Review and Update File.	0.40	\$60.00
10/17/2017	NM	\$150	Obtain and Save Transcripts and Exhibits to File	1.50	\$225.00
10/17/2017	NM	\$150	Deposition. Prep.	1.00	\$150.00
10/18/2017	MJ	\$150	Deposition. Prep.	0.80	\$120.00
10/18/2017	MJ	\$150	MSJ Prep.	4.20	\$630.00
10/18/2017	NM	\$150	Communicate with Court Reporter.	1.00	\$150.00
10/18/2017	NM	\$150	Save Transcripts to File.	0.50	\$75.00
10/20/2017	MJ	\$150	MSJ Prep.	2.20	\$330.00
10/20/2017	NM	\$150	Communicate with Court Reporter.	0.20	\$30.00
10/20/2017	NM	\$150	Update File.	0.10	\$15.00
10/23/2017	MJ	\$150	MSJ.	1.60	\$240.00
10/23/2017	MJ	\$150	MSJ Exhibits.	1.80	\$270.00
10/23/2017	MJ	\$150	MIOMSJ Binder for Judge.	2.10	\$315.00
10/23/2017	NM	\$150	Save Documents to File.	0.20	\$30.00
10/26/2017	NM	\$150	Review and Save Documents to File.	0.20	\$30.00
10/30/2017	NM	\$150	Update File.	0.10	\$15.00
10/30/2017	NM	\$150	Send Readdressed Subpoenas.	0.20	\$30.00
11/02/2017	NM	\$150	Save Transcripts and Exhibits.	0.30	\$45.00
11/02/2017	NM	\$150	Update Client File.	0.10	\$15.00
11/07/2017	NM	\$150	Update Client File.	0.10	\$15.00
11/09/2017	MJ	\$150	Proof and Get Out Discovery Responses.	0.60	\$90.00
11/28/2017	MJ	\$150	MSJ Binders.	2.20	\$330.00
12/01/2017	NM	\$150	Scan and Save Documents.	0.20	\$30.00
12/05/2017	MJ	\$150	Draft and File SFH Notice of Appearance.	0.30	\$45.00
12/12/2017	MJ	\$150	Draft Jury Instructions.	5.10	\$765.00
12/12/2017	MJ	\$150	Draft Exhibit List, Statement, Joint Stipulations Outline.	1.80	\$270.00
12/13/2017	MJ	\$150	Draft Trial Subpoenas.	0.80	\$120.00
12/14/2017	MJ	\$150	Update Invoice.	1.20	\$180.00
12/14/2017	MJ	\$150	Prep Trial Exhibits.	0.90	\$135.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
12/18/2017	MJ	\$150	Trial Subpoenas.	1.00	\$150.00
12/18/2017	MJ	\$150	Exhibit Llst.	0.90	\$135.00
12/18/2017	MJ	\$150	Trial Exhibits.	1.30	\$195.00
12/18/2017	NM	\$150	Prepare Subpoena, Cover Letter and Witness Reimbursement.	0.30	\$45.00
12/19/2017	MJ	\$150	26(a) Supp. Disclosures.	0.20	\$30.00
12/19/2017	MJ	\$150	Trial Prep.	3.20	\$480.00
12/20/2017	MJ	\$150	Trial Exhibits.	1.20	\$180.00
12/20/2017	MJ	\$150	Trial Prep.	3.70	\$555.00
12/20/2017	NM	\$150	File Review.	0.30	\$45.00
12/21/2017	MJ	\$150	Trial Prep.	1.40	\$210.00
12/21/2017	MJ	\$150	Trial Prep.	5.40	\$810.00
12/22/2017	MJ	\$150	Trial Prep.	1.80	\$270.00
12/27/2017	MJ	\$150	Trial Prep.	1.50	\$225.00
12/27/2017	MJ	\$150	Fix Final Exhibits and Send.	0.50	\$75.00
12/28/2017	MJ	\$150	Conversation Chart.	1.30	\$195.00
12/28/2017	MJ	\$150	Trial Prep.	0.20	\$30.00
01/02/2018	MJ	\$150	Contact Witnesses re TRial Date.	0.20	\$30.00
01/03/2018	MJ	\$150	Attend Jury Selection.	4.00	\$600.00
01/04/2018	MJ	\$150	Call with Price County Courthouse re Dan Rhyner's record.	0.30	\$45.00
01/04/2018	NM	\$150	Ad for Focus Group.	0.30	\$45.00
01/05/2018	NM	\$150	Re-post Ad.	0.10	\$15.00
01/08/2018	NM	\$150	Coordinate Trial Notebook Production.	0.50	\$75.00
01/12/2018	MJ	\$150	Mock Trial Prep.	3.00	\$450.00
01/12/2018	NM	\$150	Preparations and Documents for Mock Trial.	0.50	\$75.00
01/12/2018	NM	\$150	Mock Trial Prep.	3.00	\$450.00
01/16/2018	MJ	\$150	Fix Exhibits.	0.60	\$90.00
01/16/2018	MJ	\$150	Draft Text File.	1.90	\$285.00
01/17/2018	MJ	\$150	Research for Trial.	0.80	\$120.00
01/24/2018	MJ	\$150	Trial Deposition Notebooks.	2.30	\$345.00
01/24/2018	NM	\$150	Research.	0.20	\$30.00
01/24/2018	NM	\$150	Facilitate Copying of Transcripts.	0.50	\$75.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
01/25/2018	NM	\$150	Create Notebook for Demonstrative Exhibits.	0.20	\$30.00
01/26/2018	MJ	\$150	Trial Notebooks.	1.70	\$255.00
01/29/2018	NM	\$150	Travel to Court.	0.60	\$90.00
01/29/2018	MJ	\$150	Attend Trial.	7.00	\$1,050.00
01/29/2018	NM	\$150	Facilitate Presentation Board Production and Receipt.	1.00	\$150.00
01/29/2018	NM	\$150	Call Witness.	0.10	\$15.00
01/29/2018	MJ	\$150	Attend Trial.	8.10	\$1,215.00
01/30/2018	MJ	\$150	Attend Trial.	6.00	\$900.00
01/31/2018	NM	\$150	Attend Trial.	1.50	\$225.00
01/31/2018	NM	\$150	Attend Trial.	0.80	\$120.00
Total				153.80	\$23,070.00

Justin Driskell v. Summit Contracting Group, Inc.
Assisting Support Staff Time

Date	Staff	Rate	Description of Costs and Services	Time	Charge
10/07/2015	JQ	\$100	Draft Document Preservation Letter.	0.40	\$40.00
10/21/2015	JQ	\$100	Negotiations Outline.	2.00	\$200.00
07/11/2016	JQ	\$100	Draft Complaint.	2.00	\$200.00
07/19/2016	JQ	\$100	Draft Complaint.	4.00	\$400.00
07/20/2016	JQ	\$100	Draft Complaint.	3.00	\$300.00
07/21/2016	JQ	\$100	Draft Complaint.	4.00	\$400.00
10/21/2016	SS	\$100	Proof Complaint.	1.50	\$150.00
12/20/2016	CK	\$100	FOIA Request.	0.20	\$20.00
03/22/2017	MF	\$100	Review Client File.	0.70	\$70.00
04/07/2017	MF	\$100	Discovery Responses.	1.40	\$140.00
04/10/2017	MF	\$100	Discovery Responses.	0.80	\$80.00
04/11/2017	MF	\$100	Discovery Responses.	1.40	\$140.00
04/18/2017	MF	\$100	Discovery Responses.	1.60	\$160.00
04/19/2017	MF	\$100	Discovery Responses.	0.90	\$90.00
04/20/2017	MF	\$100	Discovery Responses.	0.40	\$40.00
04/27/2017	MF	\$100	Discovery Responses.	1.20	\$120.00
05/22/2017	MF	\$100	Edit Discovery Responses.	3.00	\$300.00
05/24/2017	MF	\$100	Update Contacts.	0.10	\$10.00
05/26/2017	MF	\$100	Send Discovery Responses.	0.20	\$20.00
06/05/2017	MF	\$100	Update Client File.	0.10	\$10.00
06/09/2017	MF	\$100	Schedule Call with OC.	0.10	\$10.00
06/13/2017	MF	\$100	Proof Meet and Confer.	1.00	\$100.00
06/13/2017	SS	\$100	Proof Meet and Confer / Research.	3.50	\$350.00
06/13/2017	SS	\$100	Proof Deposition Letter.	0.20	\$20.00
06/14/2017	MF	\$100	Prepare Letter / Deliver to Post Office.	0.80	\$80.00
06/20/2017	SS	\$100	Un-Redact FOIA File and Reproduce to OC.	0.75	\$75.00
06/20/2017	SS	\$100	Contractors Research.	1.50	\$150.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
06/20/2017	SS	\$100	Draft Subpoenas.	0.75	\$75.00
06/21/2017	MF	\$100	Supplemental Discovery Responses.	0.50	\$50.00
06/22/2017	MF	\$100	Supplemental Discovery Responses.	1.50	\$150.00
06/23/2017	MF	\$100	Review and Email Client re Supplemental Responses.	0.30	\$30.00
07/05/2017	SS	\$100	Subpoena Research and Contact Former Employer Counsel.	0.50	\$50.00
07/25/2017	MF	\$100	Deposition Preparation.	5.20	\$520.00
07/25/2017	SS	\$100	Deposition Preparation.	4.00	\$400.00
07/26/2017	MF	\$100	Draft / Send Subpoenas.	3.70	\$370.00
07/26/2017	SS	\$100	Deposition Preparation.	4.50	\$450.00
07/27/2017	SS	\$100	Deposition Preparation.	0.20	\$20.00
07/28/2017	MF	\$100	Send Out Subpoenas.	0.70	\$70.00
08/03/2017	SS	\$100	Meet and Confer Deficiencies Chart.	4.00	\$400.00
08/16/2017	MF	\$100	Scan In Documents.	1.80	\$180.00
08/23/2017	SS	\$100	Draft Discovery Responses.	4.00	\$400.00
08/24/2017	SS	\$100	Discovery Responses.	4.00	\$400.00
09/05/2017	SS	\$100	Deposition Prep Binder.	2.00	\$200.00
09/06/2017	MF	\$100	F/U on Subpoenas / Deposition Prep.	4.00	\$400.00
09/06/2017	SS	\$100	Review Document Production.	1.50	\$150.00
09/11/2017	SS	\$100	Deposition Prep.	1.20	\$120.00
09/11/2017	SS	\$100	Stamp Production.	1.00	\$100.00
09/11/2017	SS	\$100	Communicate with OC.	0.10	\$10.00
09/11/2017	SS	\$100	Stamp Production and Send Responses.	1.20	\$120.00
09/19/2017	SS	\$100	Interview Ricardo Rivone (All American).	0.50	\$50.00
10/02/2017	MF	\$100	Mail Deposition Transcript to Client.	0.20	\$20.00
10/04/2017	SS	\$100	Draft Motion for Extension of Time.	1.00	\$100.00
10/04/2017	SS	\$100	Interview Pam Rogers.	0.75	\$75.00
10/13/2017	SS	\$100	New Document Production.	0.50	\$50.00
10/16/2017	MF	\$100	Deposition Prep / Scan and Save Exhibits.	2.70	\$270.00
10/16/2017	SS	\$100	Deposition. Prep.	1.50	\$150.00
10/17/2017	SS	\$100	Phone Records Task.	3.00	\$300.00
10/23/2017	MF	\$100	Deliver Brief to Judge.	1.00	\$100.00

Date	Staff	Rate	Description of Costs and Services	Time	Charge
10/23/2017	SS	\$100	MSJ.	8.20	\$820.00
10/25/2017	SS	\$100	Pre/Post MSJ Settlement Offer.	0.20	\$20.00
11/01/2017	MF	\$100	Discovery Responses.	3.20	\$320.00
11/06/2017	MF	\$100	Discovery Responses.	2.50	\$250.00
11/08/2017	MF	\$100	Discovery Responses.	1.20	\$120.00
11/09/2017	MF	\$100	Finalize Discovery Responses.	0.20	\$20.00
12/13/2017	SS	\$100	Witness Trial Notebook.	1.50	\$150.00
12/13/2017	SS	\$100	Subpoena Research.	0.50	\$50.00
12/14/2017	SS	\$100	Trial Prep.	0.50	\$50.00
12/19/2017	SS	\$100	Draft Subpoena to Police Department.	0.20	\$20.00
12/27/2017	SS	\$100	Trial Prep.	0.20	\$20.00
01/08/2018	NB	\$100	Scan and File Records.	0.50	\$50.00
Total				113.45	\$11,345.00